

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SECURITIES AND EXCHANGE )  
COMMISSION, )  
Plaintiff, )  
vs. ) Case No. 4:22-cv-3359  
MAURICIO CHAVEZ, )  
GIORGIO BENVENUTO, and )  
CRYPTOFOX, LLC, )  
Defendants. )  
and )  
CBT GROUP, LLC, )  
Relief Defendant. )

ORAL VIDEOTAPED DEPOSITION

ORAL VIDEOTAPED DEPOSITION OF

MR. JULIO E. TAFFINDER

December 14, 2022

ORAL VIDEOTAPED DEPOSITION OF MR. JULIO E.  
TAFFINDER, produced as a witness at the instance of  
the Plaintiff and duly sworn, was taken in the  
above-styled and numbered cause on the 14th day of  
December, 2022, from 9:15 a.m. to 6:43 p.m., before  
Michelle Hartman, Certified Shorthand Reporter in and  
for the State of Texas and Registered Professional  
Reporter, reported by computerized stenotype machine

1 at the offices of Shook, Hardy & Bacon, LLP, JPMorgan  
2 Chase Tower, 600 Travis Street, Suite 3400, Houston,  
3 Texas 77002, pursuant to the Federal Rules of Civil  
4 Procedure and the provisions stated on the record or  
5 attached hereto.

1 Q. In general, were people more concerned  
2 about the classes continuing or the money getting  
3 paid back?

4 A. Some people were concerned about the --  
5 the classes, and then some people obviously wanted  
6 their -- their money back.

7 Q. Can you -- can you say what people were  
8 more concerned about?

9 A. I mean, after this was published, it is  
10 evident that people wanted their -- their student  
11 membership back.

12 Q. And what do you mean by "student  
13 membership"?

14 A. So whatever they purchased, so like the  
15 5,000, they wanted it back.

16 Q. They wanted their money back?

17 A. Yes, sir.

18 Q. Okay. Looking at that last entry, just  
19 to help me understand the way you would talk to  
20 Mauricio, you're asking him for a specific number of  
21 BitCoin here, right?

22 A. Yes, sir.

23 Q. And BitCoin -- at this time in early June  
24 of 2022, was a BitCoin worth about \$30,000?

25 A. I don't remember, sir.

1 together an event and make it a gala.

2 MR. PATEL: Just so -- just so it's  
3 clear, when you say his friend, who's the "he" in  
4 there?

5 THE WITNESS: Oh, Henry Pineda.

6 MR. PATEL: And whose friend is it?

7 THE WITNESS: Mauricio's friend.

8 MR. PATEL: Okay.

9 Q. (BY MR. GULDE) So he asked you and  
10 Carlos?

11 A. Uh-huh.

12 Q. What is Carlos' last name?

13 A. Campos. C-A-M-P-O-S.

14 Q. And what was -- what was Carlos' Campos'  
15 day job?

16 A. Marketing.

17 Q. Okay. And then you also mentioned Henry  
18 Pineda, P-I-N-E-D-A?

19 A. Yes, sir.

20 Q. And what was Henry's day job?

21 A. He didn't work at CFX, sir.

22 Q. Do you know what he did?

23 A. He was Mauricio's friend and was there  
24 for support.

25 Q. Is he someone that you had interacted

1 with before?

2 A. Not previous to CFX, no, sir.

3 Q. Okay. How about during your -- your  
4 activity with CFX?

5 A. Yes, sir.

6 Q. Okay. What did you see -- what kinds of  
7 things did you see Henry Pineda doing?

8 A. He would provide guidance on business.  
9 For example, he mentioned that he thought that  
10 Mauricio was spending too much money on -- on lunch  
11 for the company. So there was lunches that were  
12 provided for the employees -- employees on a daily  
13 basis.

14 Q. And who would he give that advice to?

15 A. Mauricio, sir.

16 Q. And how would you become aware of it?

17 A. Because he would tell me, sir.

18 Q. Because he, Mauricio, would tell you?

19 A. No, sir. Because Henry would -- would  
20 share that, too.

21 Q. Okay. Was there any other business  
22 advice that you know that Henry gave to Mauricio?

23 A. No, sir, other than general advice like  
24 that.

25 Q. Okay. So Henry Pineda, other than being

1 names or any contract number in the text message,  
2 right?

3 A. No, sir. No, there is -- there's a  
4 document that is mentioned here that shows the  
5 request amount that I would send him, and I needed  
6 for him to see it so he could see the urgency.

7 Q. And did that document reside in Google  
8 Drive?

9 A. Yeah, you guys can now have access to it.

10 Q. And it is still there as far as you know?

11 A. Yeah, everything should still be there.

12 Q. Is that a running document that was  
13 altered as you go or would there be a September  
14 version of that document?

15 A. There should be different iterations of  
16 the document based on the dates of that document.

17 Q. Okay. Do you know anything about the  
18 color codes on the rows here?

19 A. Oh, that was customer service, sir.

20 Q. Did they say anything to you?

21 A. Those were the ones they would highlight  
22 that would call very often, sir.

23 Q. Okay. Which --

24 A. They're --

25 Q. Do you know which color indicated more

1 them?"

2 A. I was asking -- I was trying to  
3 understand what was going on with that situation,  
4 because I had never came across it, sir.

5 Q. Yeah. And what did you end up finding  
6 out about that?

7 A. I don't exactly remember. I believe they  
8 were, but did not seem to have answered my question.

9 Q. Now, does that 18 percent mean that they  
10 were better at trading BitCoin than L.A.?

11 A. I don't know where it came from, sir.

12 Q. What's your understanding of how CFX was  
13 able to pay any percent of return on amounts invested  
14 by student investors?

15 A. Mauricio would conduct trading, sir.

16 Q. And you said trading, not training?

17 A. Trading, yes.

18 Q. Okay. So Mauricio would conduct trading  
19 in -- in what assets?

20 A. I don't know, sir.

21 Q. Now, do you know if Mauricio conducted  
22 trades in -- in crypto currency?

23 A. I witnessed a Coinbase Pro account once.

24 Q. And do you have any details of that  
25 Coinbase Pro account?

1           A.   No.   He just mentioned that he had made  
2   \$50,000 in five minutes once and then he showed the  
3   transaction.

4           Q.   When was this transaction?

5           A.   It was when I was joining, sir.

6           Q.   Would that have been around -- or when  
7   was that?

8           A.   It should have been around -- I started  
9   volunteering for classes in February, so around that  
10   time, sir.

11          Q.   And this is February of 2022?

12          A.   Yes, sir.

13          Q.   And Mauricio -- Mauricio was telling you  
14   that he just made \$50,000 in five minutes?

15          A.   Yes, sir.

16          Q.   And did he spin his monitor around and  
17   show you?

18          A.   Oh, no, he showed me on his phone, sir.

19          Q.   On his phone?

20          A.   Yeah.

21          Q.   And is this something Mauricio did more  
22   than once?

23          A.   No, sir, I only saw it once.

24          Q.   Did you ever see any -- anything on his  
25   phone or in documentation that reflected other crypto



1 issues?

2 A. No, ma'am.

3 Q. What did y'all do when there were IT  
4 issues? I have IT issues all the time. I cannot  
5 live without IT, so that's why I wanted to --

6 A. People would ask me for assistance as the  
7 crypto teacher.

8 Q. So were you always there to help?

9 A. No.

10 Q. Okay. And who would help them with  
11 resetting passwords or anything like that?

12 A. Oh, that was their -- their own doing.

13 Q. Did CFX give anyone a laptop and I mean,  
14 as a company laptop?

15 A. Yeah, people had company laptops.

16 Q. And who had company laptops?

17 A. Customer service had their company  
18 laptop.

19 Q. Okay. Anyone else other than the  
20 customer service employees?

21 A. No, ma'am, just that.

22 Q. What about the accounting personnel?

23 A. I recall them having the desktop, ma'am.

24 Q. Tell me about the security system at the  
25 CFX offices of Blalock.

1 November 2021.

2 Q. Okay. Do you recall -- you were asked  
3 about classes and I know you gave classes. Did  
4 people find your classes valuable?

5 A. Yes, sir.

6 Q. How many classes do you think you gave to  
7 them?

8 A. So I started off -- I slowly ramped up,  
9 so --

10 Q. And I'm not looking for a hard number,  
11 just a rough idea.

12 A. Over the last -- I mean, it started off  
13 as once a week, and then it ramped up to twice a  
14 week, and then it ramped up to three times a week;  
15 and then it ramped up to three times a week, plus the  
16 Chicago event or the L.A. event.

17 Q. Okay. So total overall, 30, 40, over 50?

18 A. I would say over 30, just high-level  
19 ballpark off the top of my head.

20 Q. Was there a teacher that you replaced?

21 Was someone doing it before you came in,  
22 giving classes I mean?

23 A. Yes, sir.

24 Q. And was there a particular person you  
25 replaced or --

1 A. No, sir.

2 Q. And were there others giving classes at  
3 the same time you were?

4 A. Yes, sir.

5 Q. How many others were giving classed?

6 A. So you have Juan Puac doing forex. You  
7 have Marco, at the time he was doing forex as well.  
8 Marco Barron. You have Eddie Carmona doing classes,  
9 too. You have myself. You have Juan Lemus doing  
10 motivational classes; and then you have Tony, at one  
11 point Tony Lemus developing business talk, personal  
12 development classes as well.

13 Q. And were you aware of there being -- I  
14 heard there being forex classes that they would give  
15 in the middle of the night so they could be giving  
16 them while the exchange in London was active.

17 Were you aware of that?

18 A. Juan Puac starts them at 10:00 p.m., sir.

19 Q. And that was so they could see the market  
20 moving live and demonstrate trades live?

21 A. I know they demonstrate trades live, but  
22 I have never jumped in and witnessed anything other  
23 than the time at the Chicago event.

24 Q. Okay. Now, if I heard correctly, you  
25 said Mr. Chavez was not there very much or not there

1 very much during the day at the office on Blalock; is  
2 that right?

3 A. That is correct, sir.

4 Q. Did you ever see him there during --  
5 during normal business hours?

6 A. Only once, sir.

7 Q. And when was that? Or what was the  
8 occasion?

9 A. It was August, sir. He came to inspect.

10 Q. Inspect what?

11 A. The -- the company.

12 Q. Okay. And how long was he there?

13 A. A full day.

14 Q. Okay. Now the 79 -- sorry -- 79 Protons  
15 people, is that business still operating as far as  
16 you know?

17 A. 79 Protons?

18 Q. Yeah.

19 A. I don't really know, sir.

20 Q. Okay. At the time when it was being  
21 offered through CFX or CryptoFX, did you believe that  
22 the product they were offering was, indeed, going to  
23 be backed by gold?

24 A. Based on the information they provided  
25 and their asset -- their -- the gold examples, that

1 STATE OF TEXAS

2 COUNTY OF HARRIS

3  
4 REPORTER'S CERTIFICATE

5 ORAL VIDEOTAPED DEPOSITION OF

6 MR. JULIO E. TAFFINDER

7 December 14, 2022

8  
9 I, Michelle Hartman, the undersigned  
10 Certified Shorthand Reporter in and for the State of  
11 Texas and Registered Professional Reporter, certify  
12 that the facts stated in the foregoing pages are true  
13 and correct.

14 I further certify that I am neither  
15 attorney or counsel for, related to, nor employed by  
16 any parties to the action in which this testimony is  
17 taken and, further, that I am not a relative or  
18 employee of any counsel employed by the parties  
19 hereto or financially interested in the action.  
20  
21  
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25

1 SUBSCRIBED AND SWORN TO under my hand and  
2 seal of office on this 19th day of December, 2022.

3  
4 *Michelle Hartman*  
5



6 Michelle Hartman, CSR, RPR

7 Texas CSR 7093

8 Expiration: 12/31/23  
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